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20 Attorneys for Defendant  
21 AE OUTFITTERS RETAIL CO.

22 UNITED STATES DISTRICT COURT  
23 EASTERN DISTRICT OF CALIFORNIA

24 VIVIAN SALAZAR, individually and on  
25 behalf of all others similarly situated,

26 Plaintiff,

27 vs.

28 AEO OUTFITTERS RETAIL CO., a  
Delaware Corporation; and DOES 1 to 10,  
inclusive,

Defendants.

Case No. 2:21-cv-01810-JAM-JDP

**JOINT STIPULATION TO EXTEND  
TIME FOR DEFENDANT AEO  
OUTFITTERS RETAIL CO. TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT (L.R. 144)**

Complaint Served: October 4, 2021  
Current Response Date: January 31, 2022  
New Response Date: March 2, 2022

WHEREAS, Plaintiff Vivian Salazar (“Plaintiff”) filed her Complaint on September 30, 2021;

WHEREAS, through a prior stipulation between Plaintiff and Defendant AE Outfitters Retail Co. (“Defendant”) (Plaintiff and Defendant collectively referred to as the “Parties”), Defendant’s current responsive pleading deadline is January 31, 2022;

WHEREAS, Defendant is in the process of assessing Plaintiff’s allegations in this action which is a time-consuming process given the highly technical nature of the allegations relating to the accessibility of Defendant’s website. Defendant will need more time to complete its assessment of Plaintiff’s allegations prior to responding to Plaintiff’s Complaint;

WHEREAS, the Parties are also in the process of discussing potential resolution of this matter and would like more time to conduct these discussions; and

WHEREAS, the Parties’ respective counsel have met and conferred and stipulated to an extension of time for Defendant to respond to Plaintiff’s Complaint. Good cause exists for the requested extension because successfully resolving this matter at the pleading stage promotes judicial economy by allowing the Court to focus its scarce resources on other matters.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through the Parties’ respective counsel as follows:

Defendant’s deadline to file a responsive pleading to Plaintiff’s Complaint shall be extended to March 2, 2022.

Dated: January 31, 2022

WILSHIRE LAW FIRM

By /s/ Thiago Coelho

Thiago Coelho  
Attorney for Plaintiff  
VIVIAN SALAZAR

Dated: January 31, 2022

MORGAN, LEWIS & BOCKIUS LLP

By /s/ Kathy H. Gao

KATHY H. GAO  
Attorney for Defendant  
AE OUTFITTERS RETAIL CO.

JOINT STIPULATION TO EXTEND TIME  
TO RESPOND TO PLAINTIFF’S  
COMPLAINT

**SIGNATURE ATTESTATION**

I hereby attest that all signatories listed above, on whose behalf this stipulation is submitted, concur in the filing's consent and have authorized the filing.

Dated: January 31, 2022

MORGAN, LEWIS & BOCKIUS LLP

By /s/ Kathy H. Gao

KATHY H. GAO

Attorney for Defendant

AE OUTFITTERS RETAIL CO.

**ORDER**

After considering the Parties' stipulation and good cause appearing, IT IS HEREBY ORDERED that: Defendant's deadline to respond to Plaintiff's Complaint shall be extended to March 2, 2022.

**IT IS SO ORDERED.**

Dated: January 31, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ

UNITED STATES DISTRICT COURT JUDGE